## UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

OFI RISK ARBITRAGES, OFI RISK ARB ABSOLU and TIMBER HILL LLC, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

COOPER TIRE & RUBBER COMPANY, ROY ARMES and BRADLEY HUGHES,

Defendants.

Civ. A. No. 1:14-cy-00068-LPS

**CLASS ACTION** 

JURY TRIAL DEMANDED

**ECF CASE** 

## **APPLICATION FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1.4, OFI Asset Management and Timber Hill LLC respectfully request oral argument on their Motion for Appointment as Lead Plaintiff and Approval of their Selection of Lead Counsel (D.I. 11) and the competing Motion of Zhi Sun and Xiaoyan Jia to be Appointed Lead Plaintiffs and to Approve Proposed Lead Plaintiffs' Choice of Counsel (D.I. 8). The briefing on these motions (D.I. 9, 12, 16, 18, 21 and 23) was completed on April 14, 2014.

DATED: April 16, 2014 /s/ David J. Margules

David J. Margules (Bar I.D. No. 2254) Albert J. Carroll (Bar I.D. No. 5316)

BOUCHARD MARGULES & FRIEDLANDER, P.A.

222 Delaware Avenue, Suite 1400 Wilmington, Delaware 19801 Telephone: (302) 573-3500

Facsimile: (302) 573-3501

Liaison Counsel for Proposed Lead Plaintiff OFI Asset Management and Timber Hill LLC Vincent R. Cappucci Andrew J Entwistle Robert N. Cappucci Alexander Broche

## ENTWISTLE & CAPPUCCI LLP

280 Park Avenue, 26<sup>th</sup> Floor New York, New York 10017 Telephone: (212) 894-7200 Facsimile: (212) 894-7272

Gerald H. Silk Avi Josefson Michael Blatchley

## BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

1285 Avenue of the Americas New York, New York 10019 Telephone: (212) 554-1400 Facsimile: (212) 554-1444 jerry@blbglaw.com avi@blbglaw.com michaelb@blbglaw.com

Counsel for Proposed Lead Plaintiff OFI Asset Management and Timber Hill LLC and Proposed Lead Counsel for the Class